

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
In re WARNER CHILCOTT LIMITED	:	Civil Action No. 06-CV-11515 (WHP)
SECURITIES LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	DECLARATION OF ELLEN GUSIKOFF
	:	STEWART FILED ON BEHALF OF
ALL ACTIONS.	:	COUGHLIN STOIA GELLER RUDMAN &
	:	ROBBINS LLP IN SUPPORT OF
	X	APPLICATION FOR AWARD OF
		ATTORNEYS' FEES AND EXPENSES

I, ELLEN GUSIKOFF STEWART, declare as follows:

1. I am a member of the firm of Coughlin Stoia Geller Rudman & Robbins LLP. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.
2. This firm is co-lead counsel of record for Lead Plaintiffs International Brotherhood of Electrical Workers Local 98 and Wesley Ruggles Ltd. II.
3. The identification and background of my firm and its partners is attached hereto as Exhibit A.
4. The total number of hours spent on this litigation by my firm is 3,900.50. The total lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$1,466,683.75. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Gusikoff Stewart, Ellen	(P)	104.00	675	\$ 70,200.00
Kaufman, Evan ¹	(P)	646.75	585	378,348.75
Rosenfeld, David	(P)	16.50	545	8,992.50
Rothman, Robert	(P)	4.25	600	2,550.00
Rudman, Samuel H.	(P)	123.50	715	88,302.50
Alba, Mario	(A)	17.50	475	8,312.50
Myers, Danielle S.	(A)	7.00	295	2,065.00
O'Mara, Brian O.	(A)	13.75	475	6,531.25
Reich, Mark	(A)	3.50	515	1,802.50
Torres, Carolina	(A)	615.75	345	212,433.75
Biegelman, Dan	(PA)	681.00	280	190,680.00
Boxer, Jessica	(PA)	506.00	310	156,860.00
Brandeis-Pierno, Kerry	(PA)	189.00	320	60,480.00
Koch, Andrea	(PA)	311.50	325	101,237.50

¹ Mr. Kaufman became a partner of the firm effective January 1, 2009.

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Paralegal I		136.00	290	39,440.00
Paralegal II		415.50	265	110,107.50
Paralegal III		109.00	240-275	28,340.00
TOTAL		3,900.50		\$1,466,683.75

(P) Partner

(A) Associate

(PA) Project Attorney

5. My firm incurred a total of \$133,176.85 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSES

From Inception to April 6, 2009

<i>EXPENSE CATEGORY</i>	<i>TOTAL</i>
Meals, Hotels & Transportation	\$ 3,240.44
Photocopies	31,573.18
Telephone, Facsimile	283.02
Messenger, Overnight Delivery	947.19
Filing, Witness & Other Fees	3,772.70
Court Reporters	2,685.58
Lexis, Westlaw, Online Library Research	3,927.97
Class Action Notices/Business Wire	1,120.00
Mediation Fees	28,332.48
Experts/Consultants/Investigators	57,294.29
Outside:	
Compass Lexecon	\$11,914.29
In-House:	
Economic/Damage Analysts	\$11,675.00
Investigators	1,500.00
MIS	32,205.00
TOTAL	\$ 133,176.85

6. The following is additional information regarding these expenses:

(a) the firm incurred expenses of \$2,685.58 for amounts paid to court reporters for transcripts of court hearings and depositions.

<i>DATE</i>	<i>VENDOR</i>
07/13/07	S.D.N.Y. – Transcript of Status Conference
11/16/07	TSG Reporting – Harold Kleiman

<i>DATE</i>	<i>VENDOR</i>
11/21/07	TSG Reporting – Harry Foy
11/27/07	TSG Reporting – Vijay Shankaran
02/20/08	Southern District Reporter PC – Transcript
02/21/08	S.D.N.Y. – Transcript

(b) Filing, Witness and Other Fees: \$3,772.70

<i>DATE</i>	<i>VENDOR</i>
11/01/06	Clerk of the Court
11/02/06	D&D Process Service, Inc.
01/03/07	Gary McClurg
05/08/07	D&D Process Service, Inc
05/11/07	D&D Process Service, Inc.
05/15/07	D&D Process Service, Inc.
05/16/07	D&D Process Service, Inc.
02/19/08	D&D Process Service, Inc.
04/25/08	D&D Process Service, Inc.
08/26/08	Clerk, U.S. District Court
12/31/08	Class Action Research & Litigation Support Services, Inc.
02/26/09	Class Action Research & Litigation Support Services, Inc.

(c) Meals, Hotels and Transportation: \$3,240.44. Expenses for out-of-town

meals, hotels and transportation were incurred for the following purposes:

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Rudman, Samuel H.	03/02/07	New York, NY	Attend hearing
Kaufman, Evan J.	11/05/07	Berwyn, PA	Prepare for and attend Turner deposition
Kaufman, Evan J.	11/12/07 – 11/13/07	Philadelphia, PA	Prepare for and attend Foy deposition
Kaufman, Evan J.	01/29/08 – 01/30/08	New York, NY	Prepare for and attend hearing
Rudman, Samuel H.	03/18/08	New York, NY	Attend mediation
Kaufman, Evan J.	03/18/08	New York, NY	Attend mediation
Gusikoff Stewart, Ellen	11/19/08	New York, NY	Attend settlement hearing
Kaufman, Evan J.	11/19/08	New York, NY	Attend settlement hearing

- (d) Photocopying/Imaging:
 In-house (7,006 copies @ \$0.25 per copy): \$1,751.50
 Outside Photocopy/Imaging Expenses: \$29,821.68

<i>DATE</i>	<i>VENDOR</i>
12/08/06	Rosen Mandell & Immerman, Inc.
08/08/07	Imagenet – OCR Processing
09/28/07	Imagenet – OCR Processing
10/04/07	Imagenet – OCR Processing
10/05/07	Imagenet – OCR Processing
10/17/07	Imagenet – OCR Processing
10/26/07	Imagenet – OCR Processing
11/07/07	Imagenet – OCR Processing
11/09/07	Imagenet – OCR Processing
11/15/07	Imagenet – OCR Processing
11/20/07	Imagenet – OCR Processing
11/26/07	Encore Legal Solutions
11/29/07	Imagenet – OCR Processing
11/30/07	Imagenet – OCR Processing
12/13/07	Imagenet – OCR Processing
12/14/07	Imagenet – OCR Processing
12/24/07	Imagenet – OCR Processing
12/31/07	Imagenet – OCR Processing
01/08/08	Imagenet – OCR Processing
01/25/08	Imagenet – OCR Processing
01/28/08	Inventus of New York – OCR Processing
01/30/08	Inventus of New York – OCR Processing
02/18/08	Inventus of New York – OCR Processing
02/28/08	Inventus of New York – OCR Processing
02/29/08	Inventus of New York – OCR Processing
03/18/08	Inventus of New York – OCR Processing

- (e) Lexis, Westlaw, Online Library Research: \$3,927.97. These included vendors such as Disclosure, Inc., Dow Jones Interactive, Dow Jones & Co., Inc., Lexis Nexis, CDA Investment Technologies, Pacer Service Center, West Publishing Corporation and Choice Point. These databases were used to obtain access to SEC filings, legal research and cite-checking of briefs. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9th day of April, 2009, at San Diego, California.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

Document8

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 9, 2009.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)

E-mail: elleng@csgrr.com

Mailing Information for a Case 1:06-cv-11515-WHP

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mario Alba , Jr**
malba@csgrr.com,e_file_ny@csgrr.com,drosenfeld@csgrr.com
- **Jack Gerald Fruchter**
jfruchter@aftlaw.com
- **Evan Jay Kaufman**
ekaufman@csgrr.com
- **Daniel Shay Kirschbaum**
dkirschbaum@paulweiss.com
- **Lawrence Donald Levit**
llevit@aftlaw.com
- **Fei-Lu Qian**
flqian@pomlaw.com
- **Richard A. Rosen**
rosen@paulweiss.com,sandreev@paulweiss.com
- **David Avi Rosenfeld**
drosenfeld@csgrr.com,e_file_ny@csgrr.com
- **Samuel Howard Rudman**
srudman@csgrr.com,e_file_ny@csgrr.com
- **Richard A Speirs**
rspeirs@zsz.com
- **Ellen Anne Gusikoff Stewart**
elleng@csgrr.com
- **Robyn F. Tarnofsky**
rtarnofsky@paulweiss.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

In re Warner Chilcott Limited Securities Litigation
Civil Action No. 06-CV-11515 (WHP)

Mary Eaton
Sameer Advani
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019-6099

Steven F. Marino
Marino & Conroy LLC
301 Wharton Street
Philadelphia, PA 19147